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Attorneys for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EDUARDO KING, FERNANDO KING, MI :
CASA EN EQUADOR, :
 :
 :
Plaintiffs, :
 :
vs. :
 :
 :
IMPREMEDIA, LLC, IMPREMEDIA NEW :
YORK, LLC, EL DIARIO, LLC d/b/a EL DIARIO :
LA PRENSA and EL DIARIO, L.P., GLORIA :
MEDINA, DOES 1-12, :
 :
Defendants. :
 :
----- X

10-CV-7903 (JSR)
ECF CASE

**NOTICE OF MOTION TO
PARTIALLY DISMISS THE
AMENDED COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the Declaration of David Monachino, Esq.,
executed February 9, 2011, together with the exhibits annexed thereto, Defendants'
Memorandum of Law in Support of their Partial Motion to Dismiss the Amended Complaint, and
upon all of the prior papers and proceedings herein, defendants Impremedia, LLC, Impremedia
New York, LLC, El Diario, LLC d/b/a El Diario La Prensa and El Diario, L.P., and Gloria
Medina ("Defendants"), by their undersigned counsel, will move this Court before the Honorable
Jed S. Rakoff, United States District Court Judge, at the United States Courthouse, 500 Pearl
Street, New York, New York 10007 on March 11, 2011 or a date and at a time to be designated
by the Court for an Order:

- (i) dismissing the amended complaint in this action as against Gloria Medina, pursuant to Fed. R. Civ. P. 12(b)(6), and
- (ii) granting Defendants such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to Court Order, opposition papers, if any, are to be served on or before March 3, 2011 and Defendants' reply papers, if any, are to be served on or before March 11, 2011.

PLEASE TAKE FURTHER NOTICE, that pursuant to Court Order, oral argument is scheduled for March 17, 2011 at 3:00 pm.

Dated: New York, New York
February 10, 2011

SEYFARTH SHAW LLP

By: s/ David M. Monachino
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